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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

10 LEIA MARTIN as Administrator of The
 11 Estate of Gregory Davis; CYRUS DAVIS
 12 individually and as heir of Greg E. Davis;
 13 NICHOLAS DAVIS, individually and as
 14 heir of Greg E. Davis,
 15 Plaintiffs,

16 vs.

17 UNITED STATES OF AMERICA,
 18 Defendant.

19 GREG DAVIS, JR., an individual and as
 20 heir of Greg Eugine Davis; ERIC
 21 ORRANTIA, an individual; and CARLOS
 22 CARDENAS, an individual, Plaintiffs,
 23 vs.

24 UNITED STATES OF AMERICA,
 25 Defendant.

Case No. 2:24-cv-02116-APG-EJY

Consolidated with:
 Case No. 2:24-cv-02226-APG-EJY

**Stipulation and Order to Extend
 Discovery Deadlines**

(Second Request)

26 Pursuant to LR IA 6-1 and LR 26-3, the parties request one hundred and twenty
 27 (120) days extension of discovery deadlines, which is supported by grounds and
 28 circumstances set forth below. The parties have conducted discovery diligently and in good

1 faith. However, unforeseen circumstances that are out of the parties' control necessitate the
2 request for this extension. This is the second request for an extension of the discovery
3 deadlines.

4 This Court has recently granted counsel for Plaintiffs Leia Martin, Cyrus Davis and
5 Nicholas Davis' Motions to Withdraw as Counsel. ECF Nos. 42, 44. On October 1, 2025,
6 John M. Quinn, Esq., appeared on behalf of Plaintiff Cyrus Davis. ECF No. 45. Based on
7 current information and knowledge, Plaintiffs Leia Anne Martin, Administrator of The
8 Estate of Gregory Davis, Sr., and Nicholas Davis, are not represented by Counsel.

9 **A. Request for Extension of Remaining Discovery Deadlines**

10 **1. Discovery and other matters completed to date**

11 a. The parties served their initial disclosures.

12 b. On March 25, 2025, Plaintiffs Leia Martin, Cyrus Davis, and
13 Nicholas Davis served their first sets of interrogatories, requests for production and requests
14 for admission to Defendant.

15 c. On April 4, 2025, Defendant United States served its first supplement
16 to initial disclosures.

17 d. On April 22, 2025, Plaintiffs Leia Martin, Cyrus Davis and Nicholas
18 Davis served their first supplement to initial disclosures.

19 e. On May 1, 2025, Plaintiffs Greg Davis, Jr., Eric Orrantia, and Carlos
20 Cardenas served their first supplement to initial disclosures.

21 f. On May 16, 2025, Defendant United States served its second
22 supplement to initial disclosures.

23 g. On May 16, 2025, Defendant United States served its responses to
24 Plaintiffs Leia Martin, Cyrus Davis, and Nicholas Davis' first sets of interrogatories,
25 requests for production and requests for admission.

26 h. On May 22, 2025, Plaintiffs Leia Martin, Cyrus Davis and Nicholas
27 Davis served their second supplement to initial disclosures.

1 i. On June 10, 2025, Defendant United States took the deposition of
2 Yvonne Efverlund, the ex-wife of decedent Greg Davis, Sr.

3 j. On June 13, 2025, Defendant United States scheduled the deposition
4 of Plaintiff Greg Davis, Jr. for August 14, 2025, and vacated it on August 11, 2025 due to
5 his unavailability.

6 k. On June 26, 2025, Defendant United States took the deposition of
7 Plaintiff Carlos Cardenas.

8 l. On June 30, 2026, Defendant United States took the deposition of
9 Plaintiff Cyrus Davis.

10 m. On July 3, 2025, Defendant United States served its first sets of
11 interrogatories and requests for production to Plaintiffs Leia Martin as Administrator of the
12 Estate of Gregory Davis, Cyrus Davis and Nicholas Davis. Plaintiffs' responses are
13 pending, and discovery was currently stayed until October 27, 2025 as to these Plaintiffs
14 per this Court's Order ECF No. 44.

15 n. On July 3, 2025, Defendant United States served its first sets of
16 interrogatories and requests for production to Plaintiffs Greg Davis, Jr., Eric Orrantia, and
17 Carlos Cardenas and requested signed HIPAAs for Plaintiffs Eric Orrantia and Carlos
18 Cardenas.

19 o. On July 10, 2025, Defendant United States scheduled the deposition
20 of Plaintiff Nicholas Davis for August 12, 2025, and vacated it on August 7, 2025, due to
21 his unavailability.

22 p. On July 11, 2025, Plaintiffs Greg Davis, Jr., Eric Orrantia, and Carlos
23 Cardenas served their second supplement to initial disclosures.

24 q. On July 22, 2025, Plaintiffs Leia Martin, Cyrus Davis and Nicholas
25 Davis scheduled the deposition of Chief Ranger Sones for September 4, 2025, and vacated
26 it on September 2, 2025.

1 r. On July 22, 2025, Plaintiffs Leia Martin, Cyrus Davis and Nicholas
2 Davis scheduled the deposition of Cody Negrette for September 10, 2025, and vacated it on
3 September 2, 2025.

4 s. On July 22, 2025, Plaintiffs Leia Martin, Cyrus Davis and Nicholas
5 Davis scheduled the deposition of Ranger Todd Austin for September 17, 2025, and
6 vacated it on September 2, 2025.

7 t. On July 22, 2025, Plaintiffs Leia Martin, Cyrus Davis and Nicholas
8 Davis scheduled the deposition of Ranger Miles McCall for September 22, 2025, and
9 vacated it on September 2, 2025.

10 u. On July 22, 2025, Plaintiffs Leia Martin, Cyrus Davis and Nicholas
11 Davis scheduled the deposition of Ranger Kristin Waring for September 25, 2025, and
12 vacated it on September 2, 2025.

13 v. On July 25, 2025, Plaintiffs Leia Martin, Cyrus Davis and Nicholas
14 Davis served their third supplement to initial disclosures.

15 w. On August 8, 2025, Plaintiffs Greg Davis, Jr., Eric Orrantia, and
16 Carlos Cardenas served their responses to Defendant United States' first sets of
17 interrogatories and requests for production. Plaintiffs provided a signed HIPAA for
18 Plaintiff Carlos Cardenas. Defendant is awaiting to receive a signed HIPAA for Plaintiff
19 Eric Orrantia, who is currently in prison.

20 x. On August 18, 2025, Plaintiffs Greg Davis, Jr., Eric Orrantia, and
21 Carlos Cardenas served their third supplement to initial disclosures.

22 y. On August 28, 2025, Plaintiffs Greg Davis, Jr., Eric Orrantia, and
23 Carlos Cardenas scheduled the deposition of Ranger Kristin Waring for September 25,
24 2025.

25 z. On August 28, 2025, Plaintiffs Greg Davis, Jr., Eric Orrantia, and
26 Carlos Cardenas scheduled the deposition of Cody Negrette for October 28, 2025.

27 aa. On August 28, 2025, Defendant United States scheduled the remote
28 deposition of Plaintiff Eric Orrantia for October 8, 2025.

1 bb. On September 16, 2025, Plaintiffs Greg Davis, Jr., Eric Orrantia, and
2 Carlos Cardenas served their fourth supplement to initial disclosures.

3 cc. On September 23, 2025, Plaintiffs Greg Davis, Jr., Eric Orrantia, and
4 Carlos Cardenas scheduled the deposition of Chief Ranger Sones for November 13, 2025.

5 dd. On September 25, 2025, Plaintiffs Greg Davis, Jr., Eric Orrantia, and
6 Carlos Cardenas took the deposition of Ranger Kristin Waring.

7 ee. On October 1, 2025, Plaintiffs Greg Davis, Jr., Eric Orrantia, and
8 Carlos Cardenas served their fifth supplement to initial disclosures.

9 **2. Discovery that remains to be completed**

10 a. The deposition of Plaintiff Eric Orrantia was scheduled on October 8,
11 2025, but had to be vacated due to the lapse in appropriations for the federal government.

12 b. The deposition of Cody Negrette was scheduled on October 28, 2025,
13 but had to be vacated due to the lapse in appropriations for the federal government.

14 c. The deposition of Chief Ranger Bradley Sones was scheduled on
15 November 13, 2025, but had to be vacated due to the lapse in appropriations for the federal
16 government.

17 d. Defendant is in the process of using the HIPAA for Plaintiff Carlos
18 Cardenas to obtain medical records. Defendant is awaiting to receive a signed HIPAA for
19 Plaintiff Eric Orrantia in order to obtain his medical records.

20 e. Defendant will need to reschedule the depositions of Plaintiffs
21 Nicholas Davis and Greg Davis, Jr.

22 f. The parties will need to disclose their experts and schedule their
23 respective depositions and to take depositions of any other witnesses involved in this
24 matter.

25 g. Any and all other discovery that may be appropriate and applicable
26 under the rules.

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1 **3. Reasons why discovery has not been completed**

2 As indicated above, this Court has recently granted Plaintiffs Leia Martin, Cyrus
3 Davis and Nicholas Davis' Motions to Withdraw as Counsel. ECF Nos. 42, 44. Discovery
4 as to these Plaintiffs was stayed until October 27, 2025, to allow them to retain new
5 counsel. On October 1, 2025, John M. Quinn, Esq. appeared on behalf of Plaintiff Cyrus
6 Davis. ECF No. 45. Defense counsel had previously scheduled the deposition of Plaintiff
7 Nicholas Davis in August, which was subsequently vacated due to Mr. Davis'
8 unavailability to travel to Las Vegas. No future dates had been provided to attempt to
9 reschedule this deposition. Additionally, Defense counsel had scheduled the deposition of
10 Plaintiff Greg Davis Jr. in August and had to vacate it due to being advised that there was
11 an emergency involving Mr. Davis Jr. Counsel for Greg Davis Jr. had recently informed
12 Defense counsel that his client is incarcerated, which could potentially make rescheduling
13 of his deposition difficult. Furthermore, Plaintiff Eric Orrantia is currently in prison in the
14 Southern Nevada High Desert prison facility. This has presented the parties with
15 difficulties in scheduling his deposition as it can only be conducted remotely and based on
16 approved days by the Warden of the prison facility, which has resulted in further delay.

17 Defense counsel is awaiting to receive a signed HIPAA for Plaintiff Eric Orrantia in
18 order to obtain his medical records.

19 The lapse in appropriations for the federal government which resulted in a
20 government shutdown lasting forty-four (44) days substantially delayed matters further.
21 The undersigned Assistant United States Attorney was in a furlough status and unable to
22 perform any work on this case since the government shutdown began on October 1, 2025.
23 On November 12, 2025, the United States Congress enacted, and the President signed, a
24 continuing resolution restoring appropriations and funding for the Department of Justice
25 until January 30, 2026. As of present, the Civil Defensive Division remains very busy, with
26 only two (2) Assistant United States Attorneys handling defensive cases. This request for
27 extension takes into account as well the upcoming holidays.

1 The parties' counsel conferred and agreed that one hundred and twenty (120) days
 2 extension would be proper. The parties agree that neither party will be prejudiced by the
 3 proposed extension, and that they may be prejudiced should the current schedule remain in
 4 place. The parties agree the extension is sought in good faith.

5 **4. Proposed revised discovery schedule**

6 A 120-day extension of the remaining deadlines in the case would result in the
 7 following revised discovery schedule:

<u>Scheduled Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Amend Pleadings/Add Parties	10/27/2025	02/24/2026
Initial Expert Disclosures	11/26/2025	03/26/2026
Rebuttal Expert Reports	12/29/2025	04/28/2026
Discovery Cut Off	01/26/2026	05/26/2026
Dispositive Motions	02/24/2026	06/24/2026
Pre-Trial Order	03/26/2026	07/24/2026¹

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28 ¹ If dispositive motions were filed, the deadline for the Proposed Joint Pretrial Order would
 be deferred until 30 days after the Court rules on the dispositive motions.

If dispositive motions are filed, the joint pre-trial order would be due 30 days after a decision on such motions. Disclosures under Fed. R. Civ. P. 26(a)(3), and any objections thereto, shall be included in the Joint Pretrial Order.

Respectfully submitted this 19th day of November 2025.

MAIER GUTIERREZ & ASSOCIATES <u>/s/ John M. Quinn</u> Jason R. Maier, Esq. (NV Bar No. 8557) Joseph A. Gutierrez, Esq. (NV Bar No. 9046) John M. Quinn, Esq. (NV Bar No. 16609) 8816 Spanish Ridge Avenue Las Vegas, Nevada 89148 <i>Attorneys for Plaintiffs Greg Davis, Jr., Eric Orrantia, Carlos Cardenas and Cyrus Davis</i>	SIGNAL CHATTAH First Assistant United States Attorney <u>/s/ Tamer B. Botros</u> TAMER B. BOTROS Assistant United States Attorney <i>Attorney for the United States</i>
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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: November 20, 2025